

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	§	
<b>BRAZOS LICENSING AND</b>	§	
<b>DEVELOPMENT,</b>	§	
§		
<i>Plaintiff</i>	§	Civil Action No. 6:20-CV-00952-ADA
§		Civil Action No. 6:20-CV-00953-ADA
§		Civil Action No. 6:20-CV-00956-ADA
§		Civil Action No. 6:20-CV-00957-ADA
§		Civil Action No. 6:20-CV-00958-ADA
v.		
<b>ONEPLUS TECHNOLOGY</b>	§	
<b>(SHENZHEN) CO., LTD.</b>	§	
§		
<i>Defendant.</i>	§	
§		

**DECLARATION OF MICHAEL J. LYONS IN SUPPORT OF  
DEFENDANT'S REPLY IN SUPPORT OF DEFENDANT'S  
OBJECTIONS TO SPECIAL MASTER'S REPORT AND  
RECOMMENDATION REGARDING CLAIM CONSTRUCTION**

I, Michael J. Lyons, hereby declare as follows:

I am an attorney with the law firm Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. ("Defendant" or "OnePlus") in the above captioned actions and am admitted *pro hac vice* in these actions. I have personal knowledge of the following facts. I have personal knowledge of the statements contained in this Declaration which are true and correct and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant's

October 28, 2021 Markman Hearing Presentation submitted to Special Master

Joshua J. Yi.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12<sup>th</sup> day of July 2022, in Palo Alto, California

/s/ *Michael J. Lyons*  
Michael J. Lyons